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5  
6 Counsel for Defendant SALCEDO MENDOZA  
7

8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,	)	No. CR 08-0399 PJH
	)	
12 Plaintiff,	)	DEFENDANT'S PRETRIAL
	)	CONFERENCE STATEMENT
13 v.	)	
	)	Pretrial Conference: August 27, 2008
14 JAIME SALCEDO MENDOZA,	)	
	)	
15 Defendant.	)	
	)	

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16 Pursuant to the Court's Order for Pretrial Preparation and Criminal Local Rule 17.1-1(b),  
17 Jaime Salcedo Mendoza submits the following Pretrial Conference Statement.

18 **1. Stipulation of Facts.**

19 It is anticipated that the defense will stipulate that Jaime Salcedo Mendoza was convicted  
20 on October 15, 1997. This stipulation will eliminate the need for the government to introduce  
21 evidence of the conviction as part of its attempt to prove that Mr. Salcedo Mendoza was deported  
22 after sustaining a felony conviction.

23 **2. Appointment by the Court of Interpreters**

24 Mr. Salcedo Mendoza continues to require the assistance of a Spanish language  
25 interpreter throughout the proceedings, pursuant to Federal Rule of Criminal Procedure 28..  
26

1     **3.     List of Defense Witnesses.**

2             Consistent with Mr. Salcedo Mendoza's rights under the United States Constitution, he  
3     intends to put the government to its proof. He has made no decision as of yet regarding the  
4     calling of witnesses on his own behalf.

5     **4.     Exchange of Documents, et cetera, intended to be offered at trial.**

6             Mr. Salcedo Mendoza has made no decision as of yet regarding presentation of a defense  
7     case, consistent with his right to rely upon the presumption of innocence.

8     **5.     Pretrial Resolution of Objections.**

9             The parties have not yet resolved any outstanding objections, such as those reflected in  
10    Mr. Salcedo Mendoza's motions in limine.

11    **6.     Trial Brief on Controverted Points of Law**

12            Mr. Salcedo Mendoza has identified the issues now known to him by way of his motions  
13    in limine.

14    Dated: August 13, 2008.

15                                   Respectfully submitted,

16                                   BARRY J. PORTMAN  
17                                   Federal Public Defender

18                                   /S/

19                                   RONALD TYLER  
20                                   Assistant Federal Public Defender